



City of Grand Rapids, Michigan

OFFICE OF THE MAYOR

ROSALYNN C. BLISS
MAYOR

October 3, 2018

The Honorable Representative Gary Glenn, Chair and
Honorable Members of the House Energy Policy Committee
P.O. Box 30014
Lansing, Michigan 48909-7514

Dear Representative Glenn,

I am writing to express opposition to SB 637 regarding the location and colocation of small cell wireless technology in public right-of-ways. The City has made a substantial investment in placemaking, undergrounding, strategic placement of utilities and technical infrastructure. As such, we have a vested interest in working with wireless providers to establish reasonable design conditions and placements. Additionally, the City has a demonstrated history of encouraging technology and has already facilitated the deployment of small cell technology through a successful and streamlined permitting process with a number of providers.

Our primary objectives for the deployment of small cell technology can be described as follows:

- Expanding the use and availability of technology for residents, business and visitors.
- Preserving the Right-of-Way (ROW) and traffic safety by not overburdening infrastructure and the streetscape.
- Protecting the City's investment – Grand Rapids owns many utility poles, assets, and infrastructure. It is critical that small cell technology be placed strategically on our assets to maximize their effectiveness and prevent damage to the infrastructure or a third party. Reasonable insurance and indemnification are essential to any business relationship.
- Allowing the City to continue to be a business friendly and welcoming place through a one-stop permitting process. With reasonable parameters in place, the City is able to offer predictable and nonintrusive outcomes that serve the shared interest of providing top-quality technology solutions in a way that is not a detriment to other quality-of-life factors.

Based on a collaborative process, the City has already negotiated agreements with Verizon, Mobilitie and AT&T. Our experience demonstrates that these agreements are working well, are mutually beneficial and are accomplishing the objectives stated above.

To illustrate this, here is a summary of our small cell permits since the first issued permit in September of 2016:

	Verizon	Mobilitie	AT&T
Permits Submitted	71	52	18
Permits Approved	46	29	3
Permits Canceled	9	19	0
Permits in Review	16	4	15
Non-Permitted Sites in Discussion	1	0	5

Our one-stop business friendly permitting approach has been well received and provides a consistent and predictable approach to the deployment of small cell technology. Our neighboring communities involved in the Grand Valley Metro Council (nineteen communities) have also adopted a similar permitting process. Collectively, we believe that our story proves that a collaborative and consistent approach to permitting for small cell technology has been achieved, which has the dual benefit of deploying this technology while recognizing the need for local stewardship of the public right of way.

Zoning and permitting decisions are best made by the community and local governing body that is entrusted with the responsibility for maintaining public safety and balancing that with community design and aesthetics. Zoning and permitting in Grand Rapids will look and feel differently than in Escanaba. The process is not a one size fits all approach and communities across the state are differently situated.

To illustrate this, Grand Rapids is uniquely positioned in owning 8,000 poles and operating nearly 20,000 utility poles. The City operates a street lighting utility and also provides electrical service to over 100 additional accounts. This includes over a million feet of primary distribution conductors and 3 million feet of the secondary distribution conductors. (See attached.) Additionally, Grand Rapids has a joint arrangement with a utility where they service our business, commercial and residential accounts and the City services city owned buildings, street lighting and traffic signals through our electrical distribution system. As you can see this is a substantial investment in infrastructure assets that are essential for the very function and operation of the system to provide many critical safety elements for our City. As you deliberate this legislation, please understand our opposition to this bill is motivated by our desire to protect public safety and our investment. Please vote no on SB 637.

Should you wish to discuss this further, please contact me or our Legislative Affairs Manager, Karyn Ferrick at 616-456-3657.

Sincerely,



Rosalynn Bliss

cc: Members of the House Energy Policy Committee

Attachment

City of Grand Rapids Infrastructure

1	Substation
30	Electrical Vaults
305	Small Manholes
1286	Large Manholes
213	Underground to Overhead Risers
672,655	Underground Conduit
1,037,872	Primary Distribution Conductors 2400V through 12,470V
3,110,617	Secondary Distribution Conductors 600V and below
360	Transformers
474	Surge Arrestors
8660	Poles
18,037	Light Fixtures

